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May 19, 2025

By ECF & Email

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square, Room 2103
New York, New York 10007
Failla_NYSDChambers@nysd.uscourts.gov

MEMO ENDORSED

Re: *OWH SE i.L. f/k/a VTB Bank (Europe) SE v. Citibank N.A.*, No. 1:25-cv-00466-KPF

Dear Judge Failla:

We represent Plaintiff OWH SE i.L in this matter and write jointly on behalf of both parties to seek an extension of the 30-day deadline to file a proposed protective order and confidentiality agreement and ESI protocol pursuant to paragraphs 7(b)-(d) of the April 18, 2025 Case Management Plan and Scheduling Order (ECF Doc. No. 18). The parties respectfully seek to extend the current deadline, which is May 19, 2025, by nine days, to May 28, 2025. The parties are currently discussing the parameters for discovery in this case, and the requested extension will provide sufficient time to conclude those discussions. The parties have not previously requested an extension of this deadline. Defendant Citibank N.A. consents to, and joins, this request.

We thank the Court for its time and consideration of this request.

Respectfully Submitted,



Andreas A. Frischknecht

Cc: All counsel of record (by ECF)

Application GRANTED. The parties shall submit any proposed protective order, confidentiality agreement, and/or ESI protocol on or before **May 28, 2025**.

The Clerk of Court is directed to terminate the pending motion at docket entry 20.

Dated: May 20, 2025
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE